

EXHIBIT F-1

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION
- - - - -
BLUE SPIKE, LLC,)
Plaintiff,) CASE NO.
V.) 6:12-CV-499
)
TEXAS INSTRUMENTS, INC.,)
Defendant.)
- - - - -

CONFIDENTIAL - ATTORNEYS' EYES ONLY
30(b)(6) and 30(b)(1) VIDEOTAPED DEPOSITION OF
ERLING WOLD, AN EMPLOYEE OF AUDIBLE MAGIC CORP.
MONDAY, OCTOBER 27, 2014
PAGES 1 - 177; VOLUME 1

BEHMKE REPORTING AND VIDEO SERVICES, INC.
BY: CHRISTINE L. JORDAN, CSR NO. 12262, RPR, CCRR
160 SPEAR STREET, SUITE 300
SAN FRANCISCO, CALIFORNIA 94105
(415) 597-5600

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Deposition of ERLING WOLD, VOLUME 1, taken on
behalf of PLAINTIFF, at 1000 Marsh Road, Menlo Park,
California, commencing at 1:06 P.M., MONDAY, OCTOBER
27, 2014, before Christine L. Jordan, Certified
Shorthand Reporter No. 12262, pursuant to Notice.

Confidential - Attorneys' Eyes Only

1 APPEARANCES OF COUNSEL:

2 FOR THE PLAINTIFF:

3 GARTEISER HONEA, P.C.

4 BY: RANDALL T. GARTEISER, ATTORNEY AT LAW

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1 APPEARANCES OF COUNSEL - (CONTINUED):

2 ALSO PRESENT:

3 JEFREE ANDERSON, VIDEOGRAPHER
4
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EXHIBITS

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1 MONDAY, OCTOBER 27, 2014; 1:06 P.M.

2

3 THE VIDEOGRAPHER: Here begins DVD Number 1
4 in the video deposition of Erling Wold in the matter
5 of Blue Spike, LLC, versus Texas Instruments, Inc.,
6 in the United States District Court, Eastern District
7 of Texas, Case Number 6:12-cv-00499.

8 Today's date is Monday, October 27, 2014.

9 The time on the video monitor is 1:06 p.m.

10 The video operator today is Jefree Anderson,
11 contracted by Behmke Reporting and Video Services,
12 Inc., at 160 Spear Street, Suite 300, San Francisco,
13 California.

14 This video deposition is taking place at
15 1000 Marsh Road, Menlo Park, California, and was
16 noticed by Randall Garteiser, Esquire, of Garteiser
17 Honeo, PLLC --

18 MR. GARTEISER: It's Garteiser Honea.

19 THE VIDEOGRAPHER: Please forgive me.

20 -- Garteiser Honea, PLLC.

21 MR. GARTEISER: Close enough.

22 THE VIDEOGRAPHER: "Close enough"? Sorry
23 about that.

24 Counsel, please voice identify yourselves
25 and state whom you represent.

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1 MR. GARTEISER: Randall Garteiser of
2 Garteiser Honea, along with my colleague Christopher
3 Honea, Kirk Anderson, Peter Brasher. And we may have
4 Molly Jones try and join us a little bit later.

5 MR. RAMSEY: This is Gabriel Ramsey and
6 Alyssa Caridis with Orrick Herrington Sutcliffe for
7 Audible Magic and the witness.

8 THE VIDEOGRAPHER: Thank you.

9 The court reporter today is Christine
10 Jordan, certified shorthand reporter, contracted by
11 Behmke Reporting and Video Services, Inc.

12 Would the reporter please swear in the
13 witness.

14 (Oath administered.)

15 THE WITNESS: Yes, I do.

16 THE VIDEOGRAPHER: Please begin.

17
18 ERLING WOLD,
19 having been first duly sworn, testified as follows:

20 EXAMINATION

21 BY MR. GARTEISER:

22 Q. Good morning.

23 A. Good morning.

24 Q. I'm going to be asking you a series of
25 questions. Is there any reason why you can't testify

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1 truthfully today?

2 A. No.

3 Q. Are you on any medication?

4 A. No.

5 Q. Okay. I'm going to hand you, just to keep
6 us logically in order, what's been notified -- or
7 what's been -- how we noticed this deposition.

8 And if I could get some exhibit numbers.

9 Thank you.

10 And you can kind of put these in the
11 binder --

12 A. I see.

13 Q. -- if you want. You don't have to. But if
14 you want to down the road, if it starts to get to be
15 too many.

16 Here you go.

17 (Exhibit 1 was marked for identification.)

18 BY MR. GARTEISER:

19 Q. Have you seen that document before?

20 A. I have not.

21 Q. Okay. And do you understand -- has someone
22 explained to you what a deposition entails?

23 A. Yes.

24 Q. Have you had your deposition taken before?

25 A. I have been -- I've had a deposition taken

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1 before.

2 Q. Okay. In the last ten years?

3 A. Yes.

4 Q. Last five years?

5 A. Yes.

6 Q. What was the name of that case or
7 controversy?

8 A. I believe it was the MPAA versus Hotfile.

9 Q. And what was that involving?

10 A. Hotfile is a cyberlocker, a service where
11 you can upload content. And I don't know the --
12 exactly the details of the suit. I was brought in to
13 rebut a particular other expert witness.

14 Q. Okay. So you were utilized as an expert
15 witness --

16 A. Yes.

17 Q. -- in that case?

18 Are you going to appear in this case as an
19 expert witness?

20 A. No.

21 Q. Okay. Did you help found -- were you one of
22 the founders of Audible Magic -- Muscle Fish?

23 A. Yes.

24 Q. Now, was there another company before Muscle
25 Fish?

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1 A. What do you mean?

2 Q. Good question.

3 Muscle Fish became Audible Magic, correct?

4 A. Not exactly.

5 Q. Okay. Well, explain to me that transition.

6 A. Muscle Fish was a consulting company. And
7 Audible Magic was one of our clients. And Audible
8 Magic acquired us.

15 Q. Okay. Where did you work prior to that?

16 A. For --

17 Q. Prior to Muscle Fish.

18 A. Yes.

19 For Yamaha Music Technologies.

20 Q. And how long did you work for them?

21 A. Approximately four years.

22 Q. Okay. And I've got a copy of your CV.

23 A. Yeah.

24 Q. We can get through that a little bit later.

25 I just wanted to get a little bit of the lay of the

Pages 14-176 Redacted

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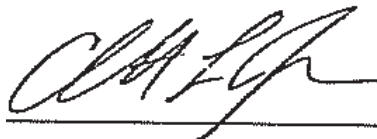
1 STATE OF CALIFORNIA)
2) ss
3 COUNTY OF SAN MATEO)
4

5 I hereby certify that the witness in the
6 foregoing deposition, ERLING WOLD, was by me duly
7 sworn to testify to the truth, the whole truth and
8 nothing but the truth, in the within-entitled cause;
9 that said deposition was taken at the time and place
10 herein named; and that the deposition is a true
11 record of the witness's testimony as reported by me,
12 a duly certified shorthand reporter and a
13 disinterested person, and was thereafter transcribed
14 into typewriting by computer.

15 I further certify that I am not interested
16 in the outcome of the said action, nor connected with
17 nor related to any of the parties in said action, nor
18 to their respective counsel.

19 IN WITNESS WHEREOF, I have hereunto set my
20 hand this 6th day of November, 2014.

21 ___X___ Reading and Signing was not
22 requested.

23 
24

25 CHRISTINE L. JORDAN, CSR NO. 12262

Restricted Source Code

IN THE UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF TEXAS

TYLER DIVISION

BLUE SPIKE, LLC,

Plaintiff,

V.

CASE NO.

6:12-CV-499

TEXAS INSTRUMENTS, INC.,

Defendant.

RESTRICTED SOURCE CODE

30(b)(6) and 30(b)(1) VIDEOTAPED DEPOSITION OF
ERLING WOLD, AN EMPLOYEE OF AUDIBLE MAGIC CORP.

MONDAY, OCTOBER 27, 2014

PAGES 178 - 250; VOLUME 1A

BEHMKE REPORTING AND VIDEO SERVICES, INC.

BY: CHRISTINE L. JORDAN, CSR NO. 12262, RPR, CCRR

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SAN FRANCISCO, CALIFORNIA 94105

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Deposition of ERLING WOLD, VOLUME 1A, taken on
behalf of PLAINTIFF, at 1000 Marsh Road, Menlo Park,
California, commencing at 1:06 P.M., MONDAY, OCTOBER
27, 2014, before Christine L. Jordan, Certified
Shorthand Reporter No. 12262, pursuant to Notice.

Restricted Source Code

1 APPEARANCES OF COUNSEL:

2 FOR THE PLAINTIFF:

3 GARTEISER HONEA, P.C.

4 BY: RANDALL T. GARTEISER, ATTORNEY AT LAW

5 CHRISTOPHER A. HONEA, ATTORNEY AT LAW

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17 San Francisco, California 94105

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19 Email: gramsey@orrick.com

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23 Los Angeles, California 90017

24 Telephone: (213) 612-2372

25 Email: acaridis@orrick.com

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1 APPEARANCES OF COUNSEL - (CONTINUED):

2 ALSO PRESENT:

3 JEFREE ANDERSON, VIDEOGRAPHER

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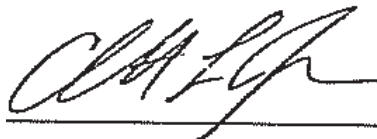
1 STATE OF CALIFORNIA)
2) ss
3 COUNTY OF SAN MATEO)
4

5 I hereby certify that the witness in the
6 foregoing deposition, ERLING WOLD, was by me duly
7 sworn to testify to the truth, the whole truth and
8 nothing but the truth, in the within-entitled cause;
9 that said deposition was taken at the time and place
10 herein named; and that the deposition is a true
11 record of the witness's testimony as reported by me,
12 a duly certified shorthand reporter and a
13 disinterested person, and was thereafter transcribed
14 into typewriting by computer.

15 I further certify that I am not interested
16 in the outcome of the said action, nor connected with
17 nor related to any of the parties in said action, nor
18 to their respective counsel.

19 IN WITNESS WHEREOF, I have hereunto set my
20 hand this 6th day of November, 2014.

21 ___X___ Reading and Signing was not
22 requested.

23 
24

25 CHRISTINE L. JORDAN, CSR NO. 12262

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION
- - - - -)
BLUE SPIKE, LLC,)
Plaintiff,)
) CASE NO.
vs.) 6:12-CV-00499
)
TEXAS INSTRUMENTS, INC., et al.,)
Defendants.)
- - - - -)

CONFIDENTIAL - ATTORNEY'S EYES ONLY
30(B)(6) and 30(B)(1) VIDEOTAPED DEPOSITION OF
THOMAS BLUM, AND EMPLOYEE OF AUDIBLE MAGIG CORP.
TUESDAY, OCTOBER 28, 2014
PAGES 1 - 277; VOLUME 1

BEHMKE REPORTING AND VIDEO SERVICES, INC.
BY: JOAN MARIE COLUMBINI, CSR NO. 5435, RPR
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(415) 597-5600

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Videotaped deposition of THOMAS BLUM, taken on behalf
of PLAINTIFF, at 1000 Marsh Road, Menlo Park,
California, commencing at 9:48 a.m., TUESDAY, OCTOBER
28, 2014, before Joan Marie Columbini, Certified
Shorthand Reporter No. 5435, pursuant to NOTICE.

Confidential

1 APPEARANCES OF COUNSEL:

2 FOR PLAINTIFF BLUE SPIKE:

3 GARTEISER HONEA, P.C.

4 RANDALL T. GARTEISER, ESQUIRE

5 CHRISTOPHER HONEA, ESQUIRE

6 KIRK J. ANDERSON, ESQUIRE

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2 FOR DEFENDANT AND THE WITNESS:

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7 Telephone: (415) 772-5700

8 Email: jjacob@orrick.com

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10 ALSO PRESENT:

11 BRIAN MONROE, Videographer

12

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Confidential

1 PROCEEDINGS; TUESDAY, OCTOBER 8, 2014; 9:48 A.M.

2

3 THE VIDEOGRAPHER: Here begins DVD No. 1 in the
4 deposition of Tom Blum in the matter of Blue Spike,
5 LLC versus Texas Instruments, Incorporated in the
6 United States District Court for the Eastern
7 District of Texas. Case No. is 6:12-CV-00499.
8 Today's date is October 28th, 2014. The time on the
9 video monitor is 9:48 a.m.

10 The video operator today is Brian Monroe
11 employed by Behmke Reporting & Video Services, Inc.
12 at 160 Spear Street, Suite 300 in San Francisco,
13 California. This video deposition is taking place
14 at 1000 Marsh Road in Menlo Park, California and was
15 noticed by Garteiser Honea, PLLC.

16 Counsel, would you please voice identify
17 yourselves for the record?

18 MR. ANDERSON: Kirk Anderson for Blue Spike with
19 my colleague Peter Brasher.

20 MR. RAMSEY: This is Gabriel Ramsey with Orrick
21 Herrington, Sutcliffe for Audible Magic Corporation
22 and the witness. I'm joined by my colleagues at
23 work Alyssa Caridis and Johanna Jacob.

24 THE VIDEOGRAPHER: And the court reporter today
25 is Joan Columbini, certified shorthand reporter,

Confidential

1 contracted by Behmke Reporting & Video Services,
2 Inc.

3 Would the court reporter now please swear
4 in the witness?

5 THOMAS BLUM,
6 having been first duly sworn, testified as follows:

7 THE WITNESS: I do.

8 THE VIDEOGRAPHER: You may begin.

9 MR. ANDERSON: Thank you.

10 THE WITNESS: Sure.

11 EXAMINATION

12 BY MR. ANDERSON

13 Q. So, Mr. Blum, have you -- is this your
14 first time being deposed?

15 A. Yes, it is.

16 Q. Okay. So, let me -- I'll begin by just
17 explaining this process a little bit. I'm sure your
18 counsel already has. But I'll be asking you
19 questions. It will be transcribed. And if you
20 could, make sure to say "yes" or "no" whenever
21 possible instead of "uh-uh" or nodding the head.
22 And I might remind you, but...

23 And you also understand that your
24 questions -- that your answers are subject to the
25 penalties of perjury?

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1 A. Yes.

2 Q. You are now under oath?

3 A. Yes.

4 Q. You are aware that your testimony can be
5 used later on now at trial?

6 A. Yes.

7 Q. If during this process you have any
8 questions about the questions that I'm asking, if
9 you don't understand anything, please let me know,
10 and I'll be happy to explain, obviously. Will you
11 do that?

12 A. Yes.

13 Q. And, also, as I'm asking you questions, you
14 may know where I'm going with that question, but if
15 you could wait until the end so the record is clear.

16 A. Okay.

17 Q. Thank you.

18 Also, your testimony today is based on your
19 personal knowledge, so you are not here to guess or
20 speculate, but just give me the -- your answer to
21 the best of your ability and recollection.

22 A. Okay.

23 Q. And as you know, your counsel may object at
24 any time during this proceeding, but unless they
25 tell you not to answer, then you may proceed and

Pages 10-276 Redacted

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1 STATE OF CALIFORNIA)

2) ss

3 COUNTY OF CONTRA COSTA)

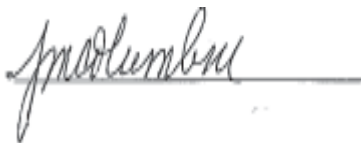
4 I hereby certify that the witness in the
5 foregoing deposition, THOMAS BLUM, was by me duly
6 sworn to testify to the truth, the whole truth and
7 nothing but the truth, in the within-entitled cause;
8 that said deposition was taken at the time and place
9 herein named; and that the deposition is a true record
10 of the witness's testimony as reported by me, a duly
11 certified shorthand reporter and a disinterested
12 person, and was thereafter transcribed into
13 typewriting by computer.

14 I further certify that I am not interested in
15 the outcome of the said action, nor connected with nor
16 related to any of the parties in said action, nor to
17 their respective counsel.

18 IN WITNESS WHEREOF, I have hereunto set my
19 hand this 10th day of November 2014.

20 Reading and Signing was:

21 ___ requested ___ waived XXX not requested
22

23 
24

25 JOAN MARIE COLUMBINI, CSR NO. 5435

Restricted Source Code

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION
- - - - -)
BLUE SPIKE, LLC,)
Plaintiff,)
) CASE NO.
vs.) 6:12-CV-00499
)
TEXAS INSTRUMENTS, INC., et al.,)
Defendants.)
- - - - -)

RESTRICTED SOURCE CODE
30(B)(6) and 30(B)(1) VIDEOTAPED DEPOSITION OF
THOMAS BLUM, AND EMPLOYEE OF AUDIBLE MAGIG CORP.
TUESDAY, OCTOBER 28, 2014
PAGES 132-192, 205-217; VOLUME 1A

BEHMKE REPORTING AND VIDEO SERVICES, INC.
BY: JOAN MARIE COLUMBINI, CSR NO. 5435, RPR
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(415) 597-5600

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Videotaped deposition of THOMAS BLUM, taken on behalf
of PLAINTIFF, at 1000 Marsh Road, Menlo Park,
California, commencing at 9:48 a.m., TUESDAY, OCTOBER
28, 2014, before Joan Marie Columbini, Certified
Shorthand Reporter No. 5435, pursuant to NOTICE.

Restricted Source Code

1 APPEARANCES OF COUNSEL:

2 FOR PLAINTIFF BLUE SPIKE:

3 GARTEISER HONEA, P.C.

4 RANDALL T. GARTEISER, ESQUIRE

5 CHRISTOPHER HONEA, ESQUIRE

6 KIRK J. ANDERSON, ESQUIRE

7 PETER S. BRASHER, ESQUIRE

8 119 W. Ferguson

9 Tyler, Texas 75702

10 Telephone: (903) 705-0828

11 Email: rgarteiser@ghiplaw.com

12
13 FOR DEFENDANT AND THE WITNESS:

14 ORRICK, HERRINGTON & SUTCLIFF, LLP

15 BY: GABRIEL RAMSEY, ESQUIRE

16 1000 Marsh Road

17 Menlo Park, California 94025

18 Telephone: (650) 614-7400

19 Email: gramsey@orrick.com

20 AND

21 BY: ALYSSA CARIDIS, ESQUIRE

22 777 South Figueroa Street, Suite 3200

23 Los Angeles, California 90017

24 Telephone: (213) 612-2372

25 Email: acaridis@orrick.com

Restricted Source Code

1 (APPEARANCES CONTINUED):

2 FOR DEFENDANT AND THE WITNESS:

3 ORRICK, HERRINGTON & SUTCLIFFE, LLP

4 BY: JOHANNA JACOB, ESQUIRE

5 405 Howard Street

6 San Francisco, California 94105

7 Telephone: (415) 772-5700

8 Email: jjacob@orrick.com

9

10 ALSO PRESENT:

11 BRIAN MONROE, Videographer

12

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-oOo-	
QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER:	
PAGE LINE	
None.	

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EXHIBITS		
THOMAS BLUM		
Number	Description	Page
Exhibit 14	Notes of release changes	
	- 171 pages	218

Pages 132-217 Redacted

Restricted Source Code

1 STATE OF CALIFORNIA)
2) ss
3 COUNTY OF CONTRA COSTA)
4

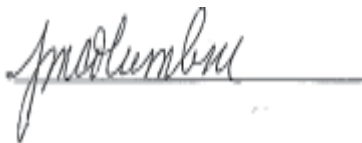
5 I hereby certify that the witness in the
6 foregoing deposition, THOMAS BLUM, was by me duly
7 sworn to testify to the truth, the whole truth and
8 nothing but the truth, in the within-entitled cause;
9 That said deposition was taken at the time and place
10 herein named; and that the deposition is a true record
11 of the witness's testimony as reported by me, a duly
12 certified shorthand reporter and a disinterested
13 person, and was thereafter transcribed into
14 typewriting by computer.

15 I further certify that I am not interested in
16 the outcome of the said action, nor connected with nor
17 related to any of the parties in said action, nor to
18 their respective counsel.

19 IN WITNESS WHEREOF, I have hereunto set my
20 hand this 10th day of November 2014.

21 Reading and Signing was:

22 ___ requested ___ waived XXX not requested

23 
24

25 JOAN MARIE COLUMBINI, CSR NO. 5435

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

- - -

BLUE SPIKE,)
)
Plaintiff,)
)
vs.) Case No. 12-CV-499-MHS-CMC
)
TEXAS INSTRUMENTS, et al,)
)
Defendants.)
_____)

VIDEO DEPOSITION OF JIM WHEATON
1000 Marsh Road
Menlo Park, California
Wednesday, October 29, 2014

Atkinson-Baker, Inc.
Court Reporters
(800) 288-3376
www.depo.com

REPORTED BY: CARRIE HEWERDINE, CSR NO. 4579
FILE NO.: A80C6D7

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

- - -

BLUE SPIKE,)
)
Plaintiff,)
)
vs.) Case No. 12-CV-499-MHS-CMC
)
TEXAS INSTRUMENTS, et al,)
)
Defendants.)
_____)

Video Deposition of JIM WHEATON, taken on behalf
of the Plaintiff at 1000 Marsh Road, Menlo Park,
California, commencing at 9:42 a.m., Wednesday,
October 29, 2014, before Carrie Hewerdine, CSR No. 4579.

A P P E A R A N C E S

For the Plaintiff:

GARTEISER HONEA
218 North College Avenue
Tyler, Texas 75702
903.705.7420
E-mail: PBrasher@ghiplaw.com
BY: PETER BRASHER, ESQ.
and RANDALL GARTEISER, ESQ.
and MOLLY JONES, ESQ.

For the Defendants:

ORRICK, HERRINGTON & SUTCLIFFE, LLP
777 South Figueroa Street
Suite 3200
Los Angeles, California 90017
213.612.2372
E-mail: Acaridis@orrick.com
BY: ALYSSA M. CARIDIS, ESQ.

ALSO PRESENT:

DENISE KWAN, Videographer

I N D E X

EXAMINEE: JIM WHEATON

EXAMINATION	PAGE
BY MR. BRASHER	6

DEPOSITION EXHIBITS REFERENCED (not attached):	PAGE
--	------

10 United States Patent, Patent Number U.S. 6,834,308 B1	178
---	-----

11 United States Patent, Patent Number U.S. 5,918,223	170
--	-----

DEPOSITION EXHIBITS MARKED:	PAGE
-----------------------------	------

15 Jim Wheaton e-mail, Sent: Monday, February 21, 2000 5:11 P.M.	66
---	----

To: fish@musclefish.com

18 Muscle Fish Letter of Understanding dated April 1, 1998	181
---	-----

19 Software Development and License Agreement [AUDMAG00403760 - AUDMAG00403773]	184
--	-----

20 Flow design for Aaron Conti project [AUDMAG01090199]	193
--	-----

1 MENLO PARK, CALIFORNIA,

2 WEDNESDAY, OCTOBER 29, 2014 AT 9:42 A.M.

3 - - -

4
5 THE VIDEOGRAPHER: Good morning. My name is
6 Denise Kwan, your videographer, and I represent
7 Atkinson-Baker, Incorporated, in Glendale, California.
8 I am not financially interested in this action, nor am I
9 a relative or employee of any attorney or any of the
10 parties.

09:43:32

09:43:45

11 The date is October 29th, 2014. The time
12 is 9:42.

13 This deposition is taking place at
14 Orrick Law Office, 1000 Marsh Road, Menlo Park,
15 California, 94025.

09:43:59

16 This is Case Number 12-CV-499-MHS-CMC,
17 entitled Blue Spike versus Texas Instruments,
18 Incorporated.

19 The deponent is Jim Wheaton. This deposition
20 is being taken on behalf of the Plaintiff.

09:44:16

21 Your court reporter is Carrie Hewerdine from
22 Atkinson-Baker.

23 Counsel will now please introduce themselves.

24 After all counsel present have introduced
25 themselves, then the witness gets sworn in by the court

09:44:26

1 reporter.

09:44:29

2 MR. BRASHER: My name is Peter Brasher
3 representing Blue Spike LLC. Later, I'll be joined by
4 my colleagues: Randall Garteiser and Molly Jones.

5 MS. CARIDIS: Alyssa Caridis of
6 Orrick, Herrington & Sutcliffe, here on behalf of
7 Audible Magic Corporation and the witness.

09:44:40

8 THE REPORTER: Would you raise your right
9 hand, please.

10

10:04:47

11 JIM WHEATON,
12 having first been duly sworn,
13 was examined and testified as follows:

14 THE WITNESS: Yes.

15

09:45:00

16 EXAMINATION

17 BY MR. BRASHER:

18 Q Good morning, Mr. Wheaton.

19 A Good morning.

20 Q As you've been prepared today, we're going to
21 be taking a deposition.

09:45:07

22 Have you ever taken a deposition before?

23 A No.

24 Q Have you ever been involved in any
25 litigation, provide a declaration, or any anything of

09:45:17

1 that sort?

09:45:20

2 A No.

3 Q But your counsel explained to you that you'd
4 be deposed today regarding this matter, Blue Spike LLC
5 versus Texas Instruments?

09:45:28

6 A Yes.

7 Q And you understand what the deposition will
8 entail?

9 A (No audible response)

10 Q You understand what a deposition is?

09:45:36

11 A I think so.

12 Q Basically, what's going to happen is I'm just
13 going to be asking you some questions related to your
14 knowledge.

15 I don't want you to speculate or guess as to
16 anything. If you know the answer to a question, you can
17 answer the question. If you don't know, you can say you
18 don't know.

09:45:49

19 If there's something that you don't
20 understand in the question that I'm asking -- I -- you
21 might get confused, or I might be trying to collect my
22 thoughts -- tell me you don't understand, and I'll try
23 to restate it in a way that you can understand it.

09:45:58

24 Is there any reason today that you can't
25 testify truthfully or to the fullest of your knowledge?

09:46:11

Pages 7-207 Redacted

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STATE OF _____)
) ss.
COUNTY OF _____)

15:40:32

I, the undersigned, declare under penalty of perjury that I have read the foregoing transcript, and I have made any corrections, additions, or deletions that I was desirous of making; that the foregoing is a true and correct transcript of my testimony contained therein.

EXECUTED this _____ day of _____
20_____, at _____, _____.
(City) (State)

JIM WHEATON

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REPORTER'S CERTIFICATE

I, CARRIE HEWERDINE, RDR, California
CSR No. 4579, Certified Shorthand Reporter, certify;

That the foregoing proceedings were taken before
me at the time and place therein set forth, at which time
the witness was put under oath by me;

That the testimony of the witness, the questions
propounded, and all objections and statements made at the
time of the examination were recorded stenographically by
me and were thereafter transcribed;

That the foregoing is a true and correct
transcript of my shorthand notes so taken.

I further certify that I am not a relative or
employee of any attorney of the parties, nor financially
interested in the action.

I declare under penalty of perjury under the laws
of California that the foregoing is true and correct.

Dated this 9th day of November, 2014.

CARRIE HEWERDINE, RDR

California CSR No. 4579 / Nevada CCR No. 820

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UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

- - - - -
BLUE SPIKE, LLC,)
Plaintiff,)
) CASE NO.
vs.) 6:12-CV-499 MHS
)
TEXAS INSTRUMENTS, INC., et al.,)
Defendants.)
- - - - -

30(B)(6) and 30(B)(1) VIDEOTAPED DEPOSITION OF
DOUGLAS F. KEISLAR,
AN EMPLOYEE OF AUDIBLE MAGIC CORP.
WEDNESDAY, NOVEMBER 19, 2014

BEHMKE REPORTING AND VIDEO SERVICES, INC.
BY: JOAN MARIE COLUMBINI, CSR NO. 5435, RPR
160 SPEAR STREET, SUITE 300
SAN FRANCISCO, CALIFORNIA 94105
(415) 597-5600

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9 Videotaped deposition of DOUGLAS F. KEISLAR,
10 taken on behalf of PLAINTIFF, at 405 Howard Street,
11 San Francisco, California, commencing at 11:07 A.M.,
12 WEDNESDAY, NOVEMBER 19, 2014, before Joan Marie
13 Columbini, Certified Shorthand Reporter No. 5435,
14 pursuant to Notice.
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1 APPEARANCES OF COUNSEL:

2 FOR PLAINTIFF BLUE SPIKE:

3 GARTEISER HONEA, P.C.

4 BY: KIRK J. ANDERSON, ESQUIRE

5 119 W. Ferguson

6 Tyler, Texas 75702

7 Telephone: (903) 705-0828

8 Email: Rgarteiser@ghiplaw.com

9
10 FOR DEFENDANT AND THE WITNESS:

11 ORRICK, HERRINGTON & SUTCLIFF, LLP

12 BY: GABRIEL RAMSEY, ESQUIRE

13 1000 Marsh Road

14 Menlo Park, California 94025

15 Telephone: (650) 614-7400

16 Email: Gramsey@orrick.com

17
18 AND

19
20 ORRICK, HERRINGTON & SUTCLIFF, LLP

21 BY: ALYSSA CARIDIS, ESQUIRE

22 777 South Figueroa Street, Suite 3200

23 Los Angeles, California 90017

24 Telephone: (213) 612-2372

25 Email: acaridis@orrick.com

1 APPEARANCES OF COUNSEL - (CONTINUED) :

2 ALSO PRESENT:

3 BRIAN MONROE, VIDEOGRAPHER

4 MOLLY JONES

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WEDNESDAY, NOVEMBER 19, 2014

DOUGLAS F. KEISLAR Page

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Examination by MR. ANDERSON (Resumed) 48

-oOo-

QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER:

PAGE LINE

None.

EXHIBITS

DOUGLAS F. KEISLAR

Number	Description	Page
<u>Exhibit 25</u>	Plaintiff's 30(b)(6) notice of oral and videotaped deposition of Defendant Audible Magic - 16 pages	167
<u>Exhibit 26</u>	Plaintiff's 30(b)(1) notice of oral and videotaped deposition of Doug Keislar, an employee of Audible Magic - 3 pages	172

1 PROCEEDINGS; WEDNESDAY, NOVEMBER 19, 2014; 11:07 A.M.

2

3 THE VIDEOGRAPHER: Here begins DVD No. 1 in the
4 deposition of Doug Keislar in the matter of Blue
5 Spike, LLC versus Texas Instruments, Incorporated,
6 in the United States District Court for the Eastern
7 District of Texas, Tyler Division. Case No. is
8 6:12-CV-499 MHS-CMC.

9 Today's date is November 19th, 2014, and
10 the time on the video monitor is 11:07 a.m.

11 The video operator today is Brian Monroe
12 employed by Behmke Reporting & Video Services, Inc.
13 at 160 Spear Street, Suite 300 in San Francisco,
14 California.

15 This video deposition is taking place at
16 Orrick, Herrington in San Francisco, California and
17 was noticed by Kirk Anderson of Garteiser Honea.

18 Counsel, would you please voice identify
19 yourselves and state whom you represent?

20 MR. ANDERSON: Kirk Anderson with the law firm
21 Garteiser Honea, representing Blue Spike, LLC, and
22 with me is my colleague Molly Jones.

23 MR. RAMSEY: This is Gabriel Ramsey, along with
24 my colleague Alyssa Caridis with Orrick,
25 Herrington & Sutcliffe for Audible Magic Corporation

1 and the witness.

2 THE COURT: And the court reporter today is Joan
3 Columbini, certified shorthand reporter, contracted
4 by Behmke Reporting & Video Services, Inc.

5 Would the court reporter now please swear
6 in the witness?

7 THE WITNESS: Don't rip the microphone off in
8 the meantime.

9 DOUGLAS F. KEISLAR,
10 having been first duly sworn, testified as follows:

11 THE WITNESS: Yes, I do.

12 THE VIDEOGRAPHER: You may begin.

13 EXAMINATION

14 BY MR. ANDERSON

15 Q. So can you state your full name for the
16 record?

17 A. Douglas Fleming Keislar.

18 Q. And, Mr. Keislar, is this the first time
19 that you've been deposed?

20 A. Yes.

21 Q. Okay. So you understand that your answers
22 are given under oath and at trial they may be used
23 as evidence; is that correct?

24 A. Yes, I do.

25 Q. And for the court reporter's sake today, if

Pages 9-182 Redacted

1 STATE OF CALIFORNIA)
2) ss
3 COUNTY OF CONTRA COSTA)

4 I hereby certify that the witness in the
5 foregoing deposition, DOUGLAS F. KEISLAR witness, was
6 by me duly sworn to testify to the truth, the whole
7 truth and nothing but the truth, in the
8 within-entitled cause; that said deposition was taken
9 at the time and place herein named; and that the
10 deposition is a true record of the witness's testimony
11 as reported by me, a duly certified shorthand reporter
12 and a disinterested person, and was thereafter
13 transcribed into typewriting by computer.

14 I further certify that I am not interested in
15 the outcome of the said action, nor connected with nor
16 related to any of the parties in said action, nor to
17 their respective counsel.

18 IN WITNESS WHEREOF, I have hereunto set my
19 hand this 3rd day of December, 2014.

20 Reading and Signing was:

21 _X_ requested ___ waived ___ not requested

22
23 
24

25 JOAN MARIE COLUMBINI, CSR NO. 5435

Highly Confidential - For Attorneys Eyes Only

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

- - - - -
BLUE SPIKE, LLC,)
Plaintiff,)
)
V.) CASE NO.
) 6:12-CV-499-MHS-CMC
TEXAS INSTRUMENTS, INC.,)
Defendant.)
- - - - -

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY
30(B)(6) and 30(B)(1) VIDEOTAPED DEPOSITION
OF VANCE E. IKEZOYE
FRIDAY, OCTOBER 31, 2014

BEHMKE REPORTING AND VIDEO SERVICES, INC.
BY: JESSICA R. WAACK, RDR, CRR, CCRR, CSR NO. 13102
160 SPEAR STREET, SUITE 300
SAN FRANCISCO, CALIFORNIA 94105
(415) 597-5600

Highly Confidential - For Attorneys Eyes Only

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7 VIDEOTAPED DEPOSITION of VANCE E. IKEZOYE,
8 taken on behalf of Plaintiff, at Orrick, Herrington &
9 Sutcliffe, 1000 Marsh Road, Menlo Park, California,
10 commencing at 9:45 a.m., Friday, October 31, 2014,
11 before Jessica R. Waack, Registered Diplomat Reporter,
12 Certified Realtime Reporter, California Certified
13 Realtime Reporter, Certified Shorthand Reporter
14 No. 13102, pursuant to Notice.
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Highly Confidential - For Attorneys Eyes Only

1 APPEARANCES OF COUNSEL:

2 FOR PLAINTIFF, BLUE SPIKE, LLC:

3 GARTEISER HONEA, P.C.

4 BY: RANDALL GARTEISER, ATTORNEY AT LAW

5 BY: CHRISTOPHER HONEA, ATTORNEY AT LAW

6 BY: KIRK ANDERSON, ATTORNEY AT LAW

7 BY: PETER BRASHER, ATTORNEY AT LAW

8 BY: MICHAEL I. BURTON, ATTORNEY AT LAW

9 218 North College Avenue,

10 Tyler, Texas 75702

11 Telephone: 903-705-7420

12 Email: Rgarteiser@ghiplaw.com

13
14
15 FOR PLAINTIFF, BLUE SPIKE, LLC:

16 GARTEISER HONEA, P.C.

17 BY: MOLLY JONES, ATTORNEY AT LAW

18 44 San Pedro Road

19 San Rafael, California 94903

20 Telephone: 415-785-3762

21 Email: Mjones@ghiplaw.com

Highly Confidential - For Attorneys Eyes Only

1 APPEARANCES OF COUNSEL CONTINUED:

2 FOR AUDIBLE MAGIC CORPORATION:

3 ORRICK, HERRINGTON & SUTCLIFFE, LLP

4 BY: GABRIEL RAMSEY, ATTORNEY AT LAW

5 BY: ALYSSA M. CARIDIS, ATTORNEY AT LAW

6 1000 Marsh Road

7 Menlo Park, California 94025

8 Telephone: 650-614-7400

9 Email: Gramsey@orrick.com

10
11 ALSO PRESENT:

12 JEFREE ANDERSON, Videotape Operator

Highly Confidential - For Attorneys Eyes Only

INDEX

FRIDAY, OCTOBER 31, 2014

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QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER:

PAGE LINE

None.

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EXHIBITS

VANCE E. IKEZOYE

Number	Description	Page
Exhibit 21	License Agreement Between Audible Magic and Wired Air Bates Stamped AUDMAG00048678 Through AUDMAG00048694 - 17 Pages	79
Exhibit 22	Organization Chart Drawn By Mr. Ikezoye - 1 Page	83
Exhibit 23	Exhibit B Entitled "Specifications, Development Schedule, Deliverables, Milestones" Bates Stamped AUDMAG00046603 - 1 Page	84
Exhibit 24	Excel Spreadsheet With Financial Data Bates Stamped AUDMAG00069300 - 18 Pages	217

Highly Confidential - For Attorneys Eyes Only

1 9:45 A.M., FRIDAY, OCTOBER 31, 2014

2
3 THE VIDEOGRAPHER: Here begins DVD No. 1 in the
4 video deposition of Vance Ikezoye in the matter of Blue
5 Spike, LLC vs. Texas Instruments, Inc. in the U.S.
6 District Court, Eastern District of Texas, Case
7 No. 6:12-CV-00499.

8 Today's date is Friday, October 31, 2014. The
9 time on the video monitor is 9:46 a.m.

10 The video operator today is Jefree Anderson,
11 contracted by Behmke Reporting and Video Services, Inc.,
12 160 Spear Street, Suite 300, San Francisco, California.

13 This video deposition is taking place at
14 1000 Marsh Road, Menlo Park, California, and was noticed
15 by Randall Garteiser, Esquire of Garteiser Honea, PLLC.

16 Counsel, please voice identify yourselves and
17 state whom you represent.

18 MR. ANDERSON: Kirk Anderson of Garteiser for
19 Plaintiff Blue Spike. With me is Peter Brasher, Randall
20 Garteiser and Chris Honea.

21 MR. RAMSEY: This is Gabriel Ramsey with Orrick,
22 Herrington & Sutcliffe for Audible Magic and the witness
23 along with my colleague Alyssa Caridis also of Orrick.

24 THE VIDEOGRAPHER: The court reporter today is
25 Jessie Waack, Certified Shorthand Reporter, contracted

Highly Confidential - For Attorneys Eyes Only

1 by Behmke Reporting and Video Services, Inc.

2 Would the reporter please swear in the witness.

3 * * * * *

4 VANCE E. IKEZOYE, called as a witness herein, having
5 been first duly sworn on oath, was examined and
6 testified as follows:

7 THE VIDEOGRAPHER: Please begin.

8 EXAMINATION

9 BY MR. ANDERSON:

10 Q. Okay. Would you state your full name for the
11 record.

12 A. Vance Evan Ikezoye.

13 Q. Okay. So it's Mr. Ikezoye? Am I saying that
14 correctly?

15 A. That's very good.

16 Q. Close enough? Okay.

17 So is this the first time that you have taken a
18 deposition?

19 A. No.

20 Q. Okay. So you are familiar with this process?

21 A. Yes.

22 Q. Okay. So you are aware that the answers that
23 you give today can be used in court?

24 A. Yes.

25 Q. And that you are subject to the same penalties

Pages 9-299 Redacted

Highly Confidential - Attorneys Eyes Only

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

BLUE SPIKE, LLC,)
Plaintiff,) CASE NO.
vs.) 6:12-CV-499-MHS-CMC
TEXAS INSTRUMENTS, INC.,)
Defendant.)

CONFIDENTIAL - ATTORNEYS' EYES ONLY

30(b)(6) and 30(b)(1) VIDEOTAPED DEPOSITION OF
JAMES SCHREMPP, AN EMPLOYEE OF AUDIBLE MAGIC CORP.

WEDNESDAY, OCTOBER 29, 2014

PAGES 1 - 259; VOLUME 1

BEHMKE REPORTING AND VIDEO SERVICES, INC.

BY: SUZANNE I. ANDRADE, CSR NO. 10682

160 SPEAR STREET, SUITE 300

SAN FRANCISCO, CALIFORNIA 94105

(415) 597-5600

Highly Confidential - Attorneys Eyes Only

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10 30(b)(6) and 30(b)(1) Videotaped deposition of
11 JAMES SCHREMPP, VOLUME 1, an employee of Audible Magic
12 Corp., taken on behalf of PLAINTIFF, at 1000 Marsh Road,
13 Menlo Park, California, commencing at 9:42 A.M., WEDNESDAY,
14 OCTOBER 29, 2014, before Suzanne I. Andrade, Certified
15 Shorthand Reporter No. 10682, pursuant to Notice.
16
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Highly Confidential - Attorneys Eyes Only

1 APPEARANCES OF COUNSEL:

2 FOR PLAINTIFF:

3 GARTEISER HONEA

4 BY: RANDALL GARTEISER, ATTORNEY AT LAW

5 KIRK ANDERSON, ATTORNEY AT LAW

6 CHRISTOPHER HONEA, ATTORNEY AT LAW

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1 APPEARANCES OF COUNSEL - (CONTINUED):

2 FOR THE DEPONENT and DEFENDANT:

3 ORRICK, HERRINGTON & SUTCLIFFE LLP

4 BY: GABRIEL M. RAMSEY, ATTORNEY AT LAW

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10 acaradis@orrick.com

11
12 ALSO PRESENT:

13 BRIAN MONROE, VIDEO OPERATOR

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WEDNESDAY, OCTOBER 29, 2014

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QUESTIONS WITNESS INSTRUCTED NOT TO ANSWER:

Page Line

None.

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EXHIBITS

JAMES SCHREMPP - VOLUME 1

Number	Description	Page
Exhibit 16	E-mail dated June 12, 2000, addressed to Jim Schrempp from Jim Schrempp Bates No. AUDMAG00041801 - 2 pages	220
Exhibit 17	SoundFisher Evaluation Agreement - 3 pages	240
Exhibit 19	E-mail string, the top e-mail dated June 10, 2000, addressed to j_schrempp@audiblemagic.com from Karl Lemaitre Bates No. AUDMAG0014877 - 3 pages	250

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1 WEDNESDAY, OCTOBER 29, 2014, 9:42 A.M.

2
3 THE VIDEO OPERATOR: Here begins DVD No. 1 in the
4 deposition of James Schrempp in the matter of Blue
5 Spike, LLC, versus Texas Instruments, Incorporated, in
6 the United States District Court for the Eastern
7 District of Texas. Case number is 6:12-CV-00499.

8 Today's date is October 29th, 2014. And the
9 time on the video monitor is 9:42 a.m.

10 The video operator today is Brian Monroe,
11 employed by Behmke Video and Reporting Services, Inc.,
12 at 160 Spear Street, Suite 300, San Francisco,
13 California.

14 This video deposition is taking place at
15 1000 Marsh Road in Menlo Park, California, and was
16 noticed by Garteiser Honea, PLLC.

17 Counsel, please voice identify yourselves for
18 the record.

19 MR. GARTEISER: Randall Garteiser.

20 MR. RAMSEY: This is Gabe Ramsey with Orrick
21 Herrington Sutcliffe for Audible Magic and the witness.

22 THE VIDEO OPERATOR: And the court reporter today is
23 Suzanne Andrade, Certified Shorthand Reporter,
24 contracted by Behmke Reporting and Video Services, Inc.

25 Would the court reporter please swear in the

Pages 8-257 Redacted

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1 Suite 300, in San Francisco, California.

2 And we are going off the record. The time on
3 the video monitor is 5:22 p.m.

4 (At 5:22 p.m. the deposition proceedings were
5 adjourned.)
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JAMES SCHREMPP
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1 STATE OF CALIFORNIA) ss.

2)

3 CITY OF COUNTY OF SAN FRANCISCO)

4 I hereby certify that the witness in the
5 foregoing deposition, JAMES SCHREMPP, was by me duly
6 sworn to testify to the truth, the whole truth and
7 nothing but the truth, in the within-entitled cause;
8 that said deposition was taken at the time and place
9 herein named; that the deposition is a true record of
10 the witness' testimony as reported by me, a duly
11 Certified Shorthand Reporter and disinterested person,
12 and was thereafter transcribed into typewriting by
13 computer.

14 I further certify that I am not interested in
15 the outcome of said action nor connected with, nor
16 related to, any of the parties in said action, nor to
17 their respective counsel.

18 IN WITNESS WHEREOF, I have hereunto set my hand
19 this 10th day of November, 2014.

20 ading and Signing was:

21 _ requested ___ waived _X_ not requested

22
23 
24

25 SUZANNE I. ANDRADE, CSR 10682

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

- - -

BLUE SPIKE,)
)
Plaintiff,)
)
vs.) Case No. CV-499-MHS-CMC
)
TEXAS INSTRUMENTAL, et al,)
)
Defendants.)
_____)

VIDEO DEPOSITION OF ROB WILLIAMS
1000 Marsh Road
Menlo Park, California
Thursday, October 30, 2014

Atkinson-Baker, Inc.
Court Reporters
(800) 288-3376
www.depo.com

REPORTED BY: CARRIE HEWERDINE, CSR NO. 4579
FILE NO.: A80C6D2

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

- - -

BLUE SPIKE,)
)
Plaintiff,)
)
vs.) Case No. CV-499-MHS-CMC
)
TEXAS INSTRUMENTAL, et al,)
)
Defendants.)
_____)

Video Deposition of ROB WILLIAMS, taken on
behalf of the Plaintiff at 1000 Marsh Road, Menlo Park,
California, commencing at 9:46 a.m., Thursday, October
30, 2014, before Carrie Hewerdine, CSR No. 4579.

A P P E A R A N C E S

For the Plaintiff:

GARTEISER HONEA

119 W. Ferguson

Tyler, Texas 75702

903.705.7420

E-mail: Kanderson@ghiplaw.com

BY: KIRK ANDERSON, ESQ.

and RANDALL GARTEISER, ESQ.

and CHRISTOPHER HONEA, ESQ.

For the Defendants:

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415.773.5535

E-mail: Gramsey@orrick.com

BY: GABRIEL M. RAMSEY, ESQ.

ALSO PRESENT:

DENISE KWAN, Videographer

I N D E X

EXAMINEE: ROB WILLIAMS

EXAMINATION PAGE

By Mr. Anderson 6

NO DEPOSITION EXHIBITS MARKED: PAGE

1 MENLO PARK, CALIFORNIA,

2 THURSDAY, OCTOBER 30, 2014 AT 9:46 A.M.

3 - - -
4

5 THE VIDEOGRAPHER: Good morning. I am Denise
6 Kwan, your videographer, and I represent Atkinson-Baker
7 in Glendale, California.

09:46:58

8 I am not financially interested in this
9 action, nor am I a relative or employee of any attorney
10 or any of the parties. The date is October 30th, 2014.
11 The time is 9:47. This deposition is taking place at
12 the Orrick Law Office, 1000 Marsh Road, Menlo Park,
13 California, 94025.

09:47:10

14 This is Case Number 12-CV-499-MHS-CMC,
15 entitled Blue Spike versus Texas Instruments, Inc. The
16 deponent is Rob Williams. This deposition is being
17 taken on behalf of the Plaintiff. Your court reporter
18 is Carrie Hewerdine from Atkinson-Baker.

09:47:35

19 Counsel will now please introduce themselves.
20 After all counsel present have introduced themselves,
21 then the witness gets sworn in by the court reporter.

09:47:50

22 MR. ANDERSON: Kirk Anderson with Garteiser
23 Honea for Plaintiff Blue Spike, and with me are my
24 colleagues, Randall Garteiser and Chris Honea.

25 MR. RAMSEY: Gabriel Ramsey with Orrick,

09:48:07

1 Herrington, Sutcliffe for Defendant Audible Magic and
2 the witness.

09:48:08

3 THE REPORTER: Would you raise your right
4 hand, please.

09:48:14

6 ROB WILLIAMS,
7 having previously been duly sworn,
8 was examined and testified as follows:

9 THE WITNESS: Yes.

09:48:24

11 EXAMINATION

12 BY MR. ANDERSON:

13 Q Mr. Williams, is this your first deposition?

14 A Yes.

15 Q So you are aware that your testimony today
16 may be used in court?

09:48:33

17 A Yes.

18 Q And is there any reason why you might not be
19 able to give truthful answers today?

20 A No.

09:48:59

21 Q Okay. So you may feel that you understand my
22 question and know what I'm asking before I've finished.
23 If you would, wait until I finish to answer the question
24 for the reporter's sake. Can you do that?

25 A Yes.

09:49:20

Pages 7-136 Redacted

1 THE VIDEOGRAPHER: This marks the end of tape 15:21:03
2 labeled Number 2 of the videotaped deposition of Rob
3 Williams on October 30th, 2014. We are now going off
4 the record. The time is 3:21.

5 THE REPORTER: And I will get you the rough 15:21:17
6 draft as soon as I can this evening as you requested.

7 MR. RAMSEY: Great. Thanks.

8 (Proceedings concluded at 3:21 p.m.)
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1 STATE OF _____)
) ss.

2 COUNTY OF _____)
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4

5 I, the undersigned, declare under penalty of
6 perjury that I have read the foregoing transcript, and I
7 have made any corrections, additions, or deletions that
8 I was desirous of making; that the foregoing is a true
9 and correct transcript of my testimony contained
10 therein.
11

12 EXECUTED this _____ day of _____
13 20____, at _____, _____.
14 (City) (State)
15
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21 _____
22 ROB WILLIAMS
23
24
25

REPORTER'S CERTIFICATE

I, CARRIE HEWERDINE, RDR, California
CSR No. 4579, Certified Shorthand Reporter, certify;

That the foregoing proceedings were taken before
me at the time and place therein set forth, at which
time the witness was put under oath by me;

That the testimony of the witness, the questions
propounded, and all objections and statements made at
the time of the examination were recorded
stenographically by me and were thereafter transcribed;

That the foregoing is a true and correct
transcript of my shorthand notes so taken.

I further certify that I am not a relative or
employee of any attorney of the parties, nor financially
interested in the action.

I declare under penalty of perjury under the
laws of California that the foregoing is true and
correct.

Dated this 10th day of November, 2014.

[Witness Signature not requested]

CARRIE HEWERDINE, RDR

California CSR No. 4579 / Nevada CCR No. 820